BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D. C. 20268-0001

RECEIVED

Mar 22 3 50 PM '00

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC. TO UNITED STATES POSTAL SERVICE WITNESS THOMAS HARAHUSH (ADVO/USPS-T3-14)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Thomas Harahush. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,

John M. Burzio

Thomas W. McLaughlin Burzio & McLaughlin 1054 31st Street, N.W. Washington, D. C. 20007 Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Thomas W. McLaughlin

March 22, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS THOMAS HARAHUSH

ADVO/USPS-T3-14. The City Carrier Cost System (CCS) is used to estimate the number of possible and actual stops and deliveries for Single Delivery Residential, Multiple Delivery Residential, and Business and Mixed for each of the eight city letter carrier route types.

- (a) For each stop type for each of the eight route types, please provide (i) the base year 1998 annual number of possible and actual stops estimates and (ii) their standard deviations, confidence intervals, and coefficients of variation.
- (b) For each delivery type for each of the eight route types, please provide (i) the 1998 annual number of possible and actual deliveries estimates and (ii) their standard deviations, confidence intervals, and coefficients of variation.